

REMARKS

The Office Action mailed on March 27, 2006, was received and its contents carefully reviewed. By the above Amendment, Applicants amended claim 18 to correct an error with regard to an antecedent basis. Applicants respectfully submit that no new matter was introduced by this amendment. As now recited, claims 1 and 4, and claims 6-31 are currently pending and are believed to be in condition for allowance. With respect, Applicants request reconsideration of the present application in light of the above amendment and the following remarks.

A. Claim Rejection under 35 U.S.C. § 112, second paragraph

Claim 18 stands rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. In the above amendment, Applicants amended claim 18 by substituting "sellers" in the preamble of claim 18 for the previous reference to "vendors." With this amendment, Applicants respectfully submit that "sellers" in the body of claim 18 has a proper antecedent basis and that the claim is no longer indefinite. As such, Applicants respectfully request reconsideration and withdrawal of this rejection.

B. Claim Rejections under 35 U.S.C. § 102

Claims 1, 4, 6-8, 10-14, 16-27, and 29-31 stand rejected under 35 U.S.C. § 102(e), as being anticipated by Rinebold et al. U.S. Patent Number 6,968,513 (the '513 patent) as indicated beginning on page 3 of the March 27, 2006, Office Action. In view of the amendments above and the comments below, Applicants respectfully request reconsideration and withdrawal of this rejection.

The present invention is generally directed to a business-to-business apparatus and method where vendors and buyers search out potential business partners through a searchable on-line directory and contact each other with requests for proposals, quotations, or additional information through the creation of a web community composed of Partner or Private Label Web sites. The co-branded Partner or Private Label Web sites can be managed through a partner-accessible extranet. Significantly, the web community can facilitate interaction between buyers and sellers, where vendors of products are contacted with requests for information leading to an on-going relationship between the buyer and seller. Information

can be exchanged through the business-to-business web community by offering more than street address and phone number contact information to interested subscribers.

For example, amended claim 1 recites an apparatus connecting buyers and sellers of products and services comprising a comprehensive directory of companies, a user-maintained database of registered and subscribing companies selected from the comprehensive directory, and service-brokering tools for interacting with the directory of companies and user-maintained database of companies. The service-brokering tools comprise registering means for buyers and sellers to subscribe to the user-maintained database, contacting means for buyers and sellers to contact subscribing members of the user-maintained database over a network, and searching means for the buyers and sellers to search the directory and the user-maintained database based on geographical boundaries. The service-brokering tools further comprise assigning means denoting a weighted importance to provider characteristics associated with each subscribing buyer and seller, ordering means for ranking buyers and sellers according to the weighted importance of provider characteristics stored in the user-maintained database, and branding means for defining visual attributes, geometric layouts, graphical layouts, textual layouts, interface elements, and logical design elements that can be used to dynamically generate a branded Web site. Amended claim 1 further recites an internal mechanism for a Web server to infer a private label interface from an initial network request of a registered and subscribing company that can persist and cache the private label interface information for the Web server by loading taxonomies specific to individual user-maintained databases and specifying the location of a request for proposal (RFP) by publishing a pending Partner record to an active record and informing servers within a qualified farm of load-balanced Web servers to re-load the active record in response to a posting of a new request in a qualified server's category.

1. The '513 Patent Fails to Disclose Proper Assigning Means as Recited in Independent Claim 1.

The '513 patent appears to discuss a system for organizing Internet information based on geographic and topical categories. However, the '513 patent does not include assigning means denoting a weighted importance to provider characteristics associated with each subscribing buyer and seller using object affiliations to indicate a level of presence each object is given in the directory, wherein the level of presence is based upon company profile,

search result positioning and access to Requests for Proposals to afford each subscribing buyer and seller to be listed in multiple brands as required by claim 1 of the present application. Specifically, the '513 patent does not disclose the use of object affiliations to indicate a level of presence each object is given in the directory, wherein the level of presence is based upon company profile, search result positioning and access to Requests for Proposals to afford each subscribing buyer and seller to be listed in multiple brands.

While the Examiner refers to column 16, lines 28-47; column 19, lines 40-50; and column 21, lines 35-55 of the '513 patent as disclosing this feature of claim 1, the cited portions of the '513 patent merely describe algorithms that can be used to determine the order in which the Merchants within a given category are displayed (see col. 16, lines 28-30). There is no disclosure of assigning means denoting a weighted importance nor of search result positioning and access to Requests for Proposals as means to afford listings of subscribing buyers and sellers to be listed in multiple brands as required by claim 1. The other cited portions of the '513 patent fail to disclose this feature as well. To wit, column 19, lines 40-50 merely disclose that banner advertisements may be purchased in three categories, namely National, Category, or Local. Further, in column 21, lines 35-55, the '513 patent merely discloses that means are provided for an employer to enter a job profile to the system or to view profiles of individuals who have agreed to be interviewed for a previously entered job profile. There is no mention of using object affiliations to indicate a level of presence each object is given in the directory where the level of presence is based upon company profile, search result positioning, and access to Requests for Proposals to afford each subscribing buyer and seller to be listed in multiple brands as recited in claim 1, nor is there disclosure of a location of a request for proposal.

2. The '513 Patent Fails to Disclose Proper Branding Means as Recited in Independent Claim 1

Additionally, the '513 patent fails to disclose branding means for defining visual attributes, geometric layouts, graphical layouts, textual layouts, interface elements, and logical design elements that can be used to dynamically generate a branded Web site to afford each subscribing buyer and seller a different appearance across directories as recited in independent claim 1.

As detailed in section 3 of the Specification starting on page 25, the present invention includes a unique Site Branding System (SBS) for automating the design and publication of a plurality of branded Web sites, all driven from a single application code base. This site branding system provides means by which the partners can manage their branded sites through an Extranet. This database-driven system enables attributes, layouts and elements to dynamically generate a branded Web site to afford each subscribing buyer and seller a different appearance across directories.

The Examiner appears to equate the branding means recited in claim 1 of the present application to merchant web site links as disclosed in the '513 patent. The Examiner cites column 11, lines 29-41 to support this assertion. However, the one file business listing disclosed in the '513 patent, which serves as a link to the web site of the merchant, is not the same as the branding means of the present application. The web site link merely is used as a shortcut to access the web site of the merchant from the category listing (see also col. 4, lines 1-6 of the '513 patent).

The '513 patent does not disclose a system or method that allows sellers to appear in different ways across multiple branded directories, nor one that allows the sharing of RFPs between the various brands according to rules established by the brands. There is no mechanism disclosed in the '513 patent by which sellers could add products to one store and have them automatically be added, or not, to other storefronts. The system and method of the present invention allows providers to be listed in multiple brands, to have different levels of promotion and information presented by brand, to have their information localized, and to manage these activities through a single interface. The system of the present invention also allows RFPs posted by buyers to be shared across all brands, or any subset of brands according to rules established by those brands. The buyers are then able to negotiate with all of these providers using a single interface. There is no mention in the '513 patent of branding means for defining for defining visual attributes, geometric layouts, graphical layouts, textual layouts, interface elements, and logical design elements that can be used to dynamically generate a branded Web site to afford each subscribing buyer and seller a different appearance across directories as recited in independent claim 1.

The other cited portions of the '513 patent fail to disclose this feature as well. In column 14, line 64 to column 15, line 6, the '513 patent discusses only a merchant designing, posting, and paying for a coupon or advertisement online (see col. 14, lines 64-66). The

remainder of this passage discloses displaying the advertisement in a selected geographic area and category with a short turnaround time. There is no disclosure, however, of branding means for defining for defining visual attributes, geometric layouts, graphical layouts, textual layouts, interface elements, and logical design elements that can be used to dynamically generate a branded Web site to afford each subscribing buyer and seller a different appearance across directories as recited in independent claim 1.

The remaining passage at column 19, lines 17-30 and lines 51-54 provides additional description of the creation, placement, and deletion of ads or coupons, but does not disclose the branding means feature to dynamically generate a branded Web site as recited in claim 1.

3. The '513 Patent Fails to Disclose A Suitable Internal Mechanism to Infer a Private Label Interface as Recited in Independent Claim 1

Also, the '513 patent fails to disclose an internal mechanism for a Web server to infer a private label interface from an initial network request of a registered and subscribing company that can persist and cache said private label interface information for the Web server by loading taxonomies specific to individual user-maintained databases and specifying the location of a request for proposal by publishing a pending Partner record to an active record and informing servers within a qualified farm of load-balanced Web servers to re-load said active record in response to a posting of a new request in a qualified server's category as recited in independent claim 1. There is simply no disclosure in the '513 patent of such a feature.

The Examiner sites column 10, line 25 through column 11, line 16 as disclosing this feature but offers no explanation as to how the disclosed section equates to the limitations recited in claim 1. The Examiner offers no further details with regard to column 25, lines 46-64 and Figure 54 when citing these portions of the '513 patent as disclosing the recited limitations of claim 1. Figure 54 in the '513 patent merely shows a simplified representation of the Internet (see col. 10, lines 26-29) while column 25, lines 46-64 discusses expiration of listings. It is not reasonable to conclude that the disclosure of the Internet in Figure 54 and expired listings in column 25, lines 46-64 meet the recited features with regard to the internal mechanism for a Web server to infer a private label interface of claim 1.

As such, the '513 patent fails to disclose all the elements of claim 1 of the present application. Applicants respectfully submit that claim 1 is allowable over the cited reference and request that the rejection of claim 1 under 35 U.S.C. § 102 be withdrawn.

4. Dependent Claims 4 and 6 Include Features Not Disclosed by the '513 Patent

Claims 4 and 6 of the present application depend upon independent claim 1 and thereby include all the limitations of claim 1 while reciting additional features of a method of the present invention. Applicants note that the Examiner asserts that Ross discloses the object that can be used to generate private label interface-specific HTML, however Ross was not the basis of the present rejection, but rather was used to reject these claims in a previous Office Action. To the extent that the Examiner is using the Rinebold reference to reject claims 4 and 6, Applicants respectfully traverse the rejection of claims 4 and 6 for similar reasons as outlined above with regard to the rejection of claim 1 under 35 U.S.C. § 102. As discussed above, the cited reference fails to disclose all the elements and limitations recited in independent claim 1 of the present application. Therefore, the applied reference also fails to disclose all the features and limitations of dependent claims 4 and 6, as well. Accordingly, Applicants respectfully submit that claims 4 and 6 are allowable by virtue of their dependency upon claim 1 as outlined above. Applicants respectfully request reconsideration and withdrawal of the rejection of claims 4 and 6 under 35 U.S.C. § 102. If the Examiner did, in fact, intend to use the Ross patent to reject claims 4 and 6, Applicants respectfully request the Examiner clarify the grounds for rejection in the next correspondence.

5. The '513 Patent Fails to Disclose Proper Means for Collecting, Storing, and Sharing Requests for Proposals as Recited in Independent Claim 7

Independent claim 7 recites, among other things, means for collecting, storing, and sharing requests for proposals, where the means for sharing requests for proposals allows buyers and sellers to supply, access, and respond to the requests for proposals by distributing the requests for proposals to predefined subscribers based upon a hierarchical set of categories selected and assigned to the requests for proposals when the requests for proposals are created.

The Examiner asserts that the '513 patent discloses these means and points to column 13, line 61 to column 14, line 21 in support of this assertion. Additionally, the Examiner

cites column 16, lines 28-36, as well. However, these passages in the '513 patent fail to disclose means for collecting, storing, and sharing requests for proposals. In fact, there is no mention of requests for proposals at all. Instead, the first passage refers to a user's request to view display banners, and if the shopper finds an item listed of interest, the shopper may make an offer to the seller (col. 13, line 61 to col. 14, line 2). This is entirely different from a Request for Proposal, much less the specific "means for collecting, storing, and sharing requests for proposals, wherein said means for sharing requests for proposals allows said buyers and sellers to supply, access, and respond to said requests for proposals by distributing said requests for proposals to predefined subscribers based upon a hierarchical set of categories selected and assigned to said requests for proposals when said requests for proposals are created" as recited in claim 7. Similarly, the cited passage in column 16, lines 28-36 relates to algorithms which can be used to determine the order in which the merchants within a given category are displayed. There is simply no disclosure in the '513 patent of the recited means for collecting, storing, and sharing requests for proposals, and the Examiner offers no further details with regard to how these cited portions of the '513 patent purportedly disclose the recited means for collecting, storing, and sharing RFPs limitations of claim 7.

6. The '513 Patent Fails to Disclose Proper Means for Partner Web Site Branding as Recited in Independent Claim 7

Independent claim 7 also recites means for partner web site branding, wherein said means for partner web site branding allows said buyers and sellers to encapsulate web site branding information to form a community to facilitate the sharing of said requests for proposals and to publish modifications made to said requests for proposal.

The Examiner asserts that the '513 patent discloses these means and points to column 11, lines 29-41 and to column 14, line 64 to column 15, line 6 in support of this assertion. Additionally, the Examiner cites column 19, lines 17-30 and lines 51-54, as well as column 22, lines 53-63; column 20, lines 39-60, and column 25, line 65 to column 26, line 16. However, these passages in the '513 patent fail to disclose means for partner web site branding where the means allow buyers and sellers to encapsulate web site branding information to form a community to facilitate sharing of requests for proposals and to publish modifications made to the requests for proposals. In fact, in the '513 patent, there is no mention of requests for proposals at all. Instead, the first cited passage refers to merchants

receiving one file business listing, which serves as a link to the web site of the merchant, which is not the same as the branding means of the present application. The web site link merely is used as a shortcut to access the web site of the merchant from the category listing (see also col. 4, lines 1-6 of the '513 patent).

The other cited portions of the '513 patent fail to disclose this feature as well, and the Examiner does not provide any additional explanation equating the '513 patent to the recited features of claim 7. For example, in column 14, line 64 to column 15, line 6, the '513 patent discusses only a merchant designing, posting, and paying for a coupon or advertisement online (see col. 14, lines 64-66). The remainder of this passage discloses displaying the advertisement in a selected geographic area and category with a short turnaround time. There is no disclosure, however, of means for partner web site branding that allows said buyers and sellers to encapsulate web site branding information to form a community to facilitate the sharing of said requests for proposals and to publish modifications made to said requests for proposal as recited in independent claim 7.

The remaining passage at column 19, lines 17-30 and lines 51-54 as well as column 22, lines 53-63; column 20, lines 39-60, and column 25, line 65 to column 26, line 16, provide additional description of the creation, placement, and deletion of ads or coupons, and the ability to add a shopping basket, appointment schedule, and a transaction mechanism between a shopper and a merchant, but do not disclose the branding means feature to dynamically generate a branded Web site as recited in independent claim 7.

There is simply no disclosure in the '513 patent of the recited branding means for partner web site branding that allows said buyers and sellers to encapsulate web site branding information to form a community to facilitate the sharing of said requests for proposals and to publish modifications made to said requests for proposal, and the Examiner offers no further details with regard to how these cited portions of the '513 patent purportedly disclose the recited branding means of claim 7. As such, the '513 patent fails to disclose all the elements of claim 7 of the present application. Applicants respectfully submit that claim 7 is allowable over the cited reference and request that the rejection of claim 7 under 35 U.S.C. § 102 be withdrawn.

7. Dependent Claims 8, 10, and 11 Include Features Not Disclosed by the '513 Patent

Claims 8, 10, and 11 of the present application depend upon independent claim 7 and thereby include all the limitations of claim 7 while reciting additional features of an apparatus of the present invention. Applicants respectfully traverse the rejection of claims 8, 10, and 11 for similar reasons as outlined above with regard to the rejection of claim 7 under 35 U.S.C. § 102. As discussed above, the cited reference fails to disclose all the elements and limitations recited in independent claim 7 of the present application. Therefore, the applied reference also fails to disclose all the features and limitations of dependent claims 8, 10, and 11, as well. Accordingly, Applicants respectfully submit that claims 8, 10, and 11 are allowable by virtue of their dependency upon claim 7 as outlined above. Applicants respectfully request reconsideration and withdrawal of the rejection of claims 8, 10, and 11 under 35 U.S.C. § 102.

8. Independent Claim 12 Includes Features Not Disclosed by the '513 Patent

Independent claim 12 of the present application recites a method for connecting buyers and sellers of products and services employing the apparatus of independent claim 7. As such, Applicants respectfully request reconsideration and withdrawal of the rejection of claim 12 for the reasons outlined above with regard to the collecting, storing, and sharing requests for proposals and the branding of partner web site information described with regard to claim 7. Applicants respectfully traverse the rejection of claim 12 for similar reasons as outlined above with regard to the rejection of claim 7 under 35 U.S.C. § 102. As discussed above, the cited reference fails to disclose all the elements and limitations recited in independent claim 7 of the present application. Thus, the applied reference also fails to disclose all the features and limitations of claim 12, as well. Accordingly, Applicants respectfully submit that claim 12 is allowable for at least the reasons outlined above with regard to claim 7. Applicants respectfully request reconsideration and withdrawal of the rejection of claim 12 under 35 U.S.C. § 102.

9. Dependent Claims 13, 14, and 16 Include Features Not Disclosed by the '513 Patent

Claims 13, 14, and 16 of the present application depend upon independent claim 12 and thereby include all the limitations of claim 12 while reciting additional features of a method of the present invention. Applicants respectfully traverse the rejection of claims 13, 14, and 16 for similar reasons as outlined above with regard to the rejection of claim 12 under 35 U.S.C. § 102. As discussed above, the cited reference fails to disclose all the elements and limitations recited in independent claim 12 of the present application. Therefore, the applied reference also fails to disclose all the features and limitations of dependent claims 13, 14, and 16, as well. Accordingly, Applicants respectfully submit that claims 13, 14, and 16 are allowable by virtue of their dependency upon claim 12 as outlined above. Applicants respectfully request reconsideration and withdrawal of the rejection of claims 13, 14, and 16 under 35 U.S.C. § 102.

10. Independent Claims 17 and 18 Include Features Not Disclosed by the '513 Patent

Independent claims 17 and 18 of the present application recite methods for connecting buyers and sellers of products and services and for providing an on-line directory of sellers by which buyers contact sellers with requests for proposal information. Both independent claims 17 and 18 recite providing a request for proposal application for integration into a web site of a partner and co-branding the request for proposal application.

The Examiner asserts that the '513 patent discloses these features and points to column 14, lines 1-17 and column 21, line 9 to column 22, line 31 in support of this assertion. However, these passages in the '513 patent fail to disclose providing a request for proposal application for integration into a web site of a partner and co-branding the request for proposal application. In fact, in the '513 patent, there is no mention of requests for proposals at all. Instead, the first cited passage refers to posting an item for sale on a best offer basis instead of posting a selling price. This offer-acceptance of a sale cannot reasonably be equated to the recited request for proposal, much less the request for proposal application for integration into a web site of a partner of claims 17 and 18. There is no disclosure in the '513 patent of integrating a request for proposal into partnered web sites.

The other cited portions of the '513 patent fail to disclose these steps as well, and the Examiner does not provide any additional explanation equating the '513 patent to the recited

features of claims 17 and 18. For example, in column 21, line 9 to column 22, line 31, the '513 patent discusses only a merchant posting job openings or viewing a list of career profiles from individuals who have agreed to be interviewed (see col. 21, lines 9-11 and lines 34-39). The remainder of this passage discloses entering the job profile. There is no disclosure, however, of providing a request for proposal application for integration into a web site of a partner and co-branding the request for proposal application as recited in independent claims 17 and 18, and the Examiner offers no further details with regard to how these cited portions of the '513 patent purportedly disclose the recited request for proposal application for integration into a web site of a partner of claims 17 and 18. As such, the '513 patent fails to disclose all the elements of claims 17 and 18 of the present application. Applicants respectfully submit that claims 17 and 18 are allowable over the cited reference and request that the rejection of claims 17 and 18 under 35 U.S.C. § 102 be withdrawn.

11. The '513 Patent Fails to Disclose A System for Providing An On-Line Directory of Providers by Which Buyers Contact the Providers with Requests for Proposals through the Creation of a Web Community as Recited in Independent Claim 19

Independent claim 19 recites a system for providing an on-line directory of providers by which buyers contact the providers with requests for proposals through the creation of a web community with partner web sites. The system comprises a data sharing engine to collect, store, and control access to the requests for proposals; a subscription sales processor to provide subscribers a termed presence in the system; a request brokering engine to communicate requests for proposals between buyers and providers; and a geographic radius searching engine for buyers and providers to find each other based upon geographic locations and distances. Specifically, the request brokering engine includes a request notification mechanism, a request aging process mechanism, an object catalog manager, and a catalog synchronization processor.

In contrast, the '513 patent does not include a data sharing engine to collect, store, and control access to the requests for proposals. In fact, there is no disclosure whatsoever of requests for proposals, nor of managing these requests as required by claim 19 of the present application. While the Examiner refers to column 13, line 61 to col. 14, line 21 of the '513 patent as disclosing this feature of claim 19, the cited portions of the '513 patent merely describe posting an item for sale on a "best offer" basis, instead of posting a selling price (see

col. 14, lines 3-6). There is no disclosure of a data sharing engine to manage access to requests for proposals.

Likewise, the '513 patent fails to disclose a request brokering engine to communicate requests for proposals between buyers and providers, much less a request brokering engine including the specific features recited in claim 19. Instead, the cited portions of the '513 patent disclose only a system for organizing Internet information based on geographic and topical categories (see col. 11, lines 40-45). The '513 patent further discloses software programs and a database, but fails to disclose a mechanism to communicate requests for proposals between buyers and providers including a request notification mechanism, a request aging process mechanism, an object catalog manager, and a catalog synchronization processor. There is simply no disclosure in the '513 patent of a mechanism to broker requests for proposals with the recited features of claim 19, and the Examiner offers no further details with regard to how these cited portions of the '513 patent purportedly disclose the recited request brokering engine recited in claim 19. As such, the '513 patent fails to disclose all the elements of claim 19 of the present application. Applicants respectfully submit that claim 19 is allowable over the cited reference and request that the rejection of claim 19 under 35 U.S.C. § 102 be withdrawn.

12. Dependent Claims 20-27 and 29-31 Include Features Not Disclosed by the '513 Patent

Claims 20-27 and 29-31 of the present application depend upon independent claim 19 and thereby includes all the limitations of claim 19 while reciting additional features of a system of the present invention. Applicants respectfully traverse the rejection of claims 20-27 and 29-31 for similar reasons as outlined above with regard to the rejection of claim 19 under 35 U.S.C. § 102. As discussed above, the cited reference fails to disclose all the elements and limitations recited in independent claim 19 of the present application. Therefore, the applied reference also fails to disclose all the features and limitations of dependent claims 20-27 and 29-31 as well. Accordingly, Applicants respectfully submit that claims 20-27 and 29-31 are allowable by virtue of their dependency upon claim 19 as outlined above. Applicants respectfully request reconsideration and withdrawal of the rejection of claims 20-27 and 29-31 under 35 U.S.C. § 102.

C. Claim Rejections under 35 U.S.C. § 103

Claims 9, 15, 28, and 29 stand rejected under 35 U.S.C. § 103(a), as being unpatentable over Rinebold et al. U.S. Patent Number 6,968,513 (the '513 patent) in view of Cupps et al. U.S. Patent Number 5,991,739 (the '739 patent) as indicated beginning on page 7 of the Office Action mailed March 27, 2006. In view of the amendments above and the comments below, Applicants respectfully request reconsideration and withdrawal of this rejection.

Claim 9 of the present application depends upon independent claim 7 and thereby include all the limitations of claim 7 while reciting additional features of an apparatus of the present invention. Applicants respectfully traverse the rejection of claim 9 for similar reasons as outlined above with regard to the rejection of claim 7 under 35 U.S.C. § 102. As discussed above, the cited '513 patent fails to disclose all the elements and limitations recited in independent claim 7 of the present application. Namely, the '513 patent fails to disclose means for collecting, storing, and sharing requests for proposals. In fact, as indicated above with regard to claim 7, there is no mention of requests for proposals at all. Likewise, the '513 patent fails to disclose means for partner web site branding, wherein said means for partner web site branding allows said buyers and sellers to encapsulate web site branding information to form a community to facilitate the sharing of said requests for proposals and to publish modifications made to said requests for proposal.

The '739 patent fails to cure the deficiencies of the '513 patent. The '739 patent does not disclose means for partner web site branding, where the means for partner web site branding allows buyers and sellers to encapsulate web site branding information to form a community to facilitate the sharing of the requests for proposals and to publish modifications made to the requests for proposal. The '739 patent appears to disclose a system and method for providing an online ordering machine that manages the distribution of home delivered products over a distributed computer system, but there is no mention of partner web site branding, much less partner web site branding that allows buyers and sellers to encapsulate web site branding information to form a community to facilitate the sharing of requests for proposals as required by claim 9.

Applicants respectfully submit that the cited references, both individually and collectively, fail to disclose all the elements and limitations recited in amended independent claim 9 of the present application.

Similarly, claim 15 is dependent upon claim 12, and claims 28 and 29 are dependent upon claim 19. Claim 15 thereby includes all the limitations of claim 12 while reciting additional features of a method of the present invention. Also, claims 28 and 29 include all the limitations of claim 19 while reciting additional features of a system of the present invention. Applicants respectfully traverse the rejection of claim 15 for similar reasons as outlined above with regard to the rejection of claim 12 under 35 U.S.C. § 102 and traverse the rejection of claims 28 and 29 for similar reasons as outlined above with regard to the rejection of claim 19 under 35 U.S.C. § 102. As discussed above, the cited '513 patent fails to disclose all the elements and limitations recited in independent claims 12 and 19 of the present application. Namely, the '513 patent fails to disclose means for collecting, storing, and sharing requests for proposals and the dynamic branding of partner web site information encapsulating the branding information into a web server template for display of the requests for proposals on a subscriber computer.

The '739 patent fails to cure the deficiencies of the '513 patent. The '739 patent does not disclose means for partner web site branding, where the means for partner web site branding allows buyers and sellers to encapsulate web site branding information into a server template for display of the requests for proposals on a subscriber computer and fails to disclose a proper request brokering engine to communicate requests for proposals as recited in the independent claims 12 and 19. Instead, the '739 patent appears to disclose a system and method for providing an online ordering machine that manages the distribution of home delivered products over a distributed computer system. However, there is no mention of partner web site branding, much less partner web site branding that allows buyers and sellers to encapsulate web site branding information into a web server template for display of the requests for proposals on a subscriber computer.

Applicants respectfully submit that the cited references, both individually and collectively, fail to disclose all the elements and limitations recited in dependent claims 15, 28, and 29 of the present application.

For these reasons, the Examiner fails to establish a *prima facie* case of obviousness under 35 U.S.C. § 103. Applicants respectfully submit that dependent claims 9, 15, 28, and 29 are allowable over the cited references and request that the rejection of claims 9, 15, 28, and 29 under 35 U.S.C. § 103 be withdrawn.

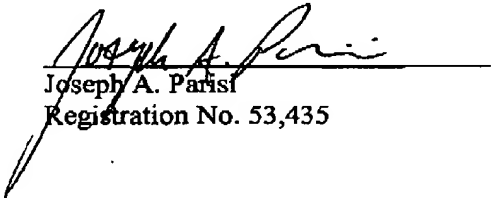
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D. Conclusion

In view of the above amendments and remarks, Applicants respectfully request the Examiner's reconsideration of this application and the timely allowance of the pending claims.

Respectfully submitted,

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